

From: [Sivak, Michael](#)
To: [Mishkin, Katherine](#); [Mitchell, Tanya](#); [Clemetson, Michael](#)
Cc: [Metz, Chloe](#)
Subject: RE: Rolling Knolls Requested Map and Location Information
Date: Friday, July 24, 2015 1:58:00 PM

Katie,

Thanks for the feedback.

Regarding the locations where you are on the fence, in the example you provided, the existing data for PCBs is above the criteria, but below the ARAR. I would say, based on the conversation we all participated in during the call, that we would not need to delineate below the ARAR. The RI would discuss that data are above screening criteria in these locations. So, I guess what I'm saying is that if that's the basis for justification of additional samples – above risk-based screening or impact to groundwater criteria, but below ARARs – then I would say that no further delineation is needed in order to move into the FS.

Michael Sivak
212.637.4310

From: Mishkin, Katherine
Sent: Thursday, July 23, 2015 4:17 PM
To: Sivak, Michael; Mitchell, Tanya; Clemetson, Michael
Cc: Metz, Chloe
Subject: RE: Rolling Knolls Requested Map and Location Information

Tanya,

I had a chance to review NJDEP's proposed sampling locations and have provided my comments next to each proposed location in the attached PDF.

In summary, I am basically in agreement with what Michael provided below. Often they are asking for delineation points when we already have a sample that is serving as a current delineation point and shows no presence of site-related contamination. They justify several points by saying they are in depositional zones; however, I do not think they are working off of precise elevations and are making assumptions. The elevation differences at the most are maybe 5 ft, so really would not make much of a difference in terms of surface runoff. Also, as Michael expressed below, I do not understand their logic for additional interior samples.

The data points that I would agree with are those that are stepping out from sampling points where contamination remains above our delineation criteria and some of the surface water bodies that could be serving as collection points.

Overall, I think we have a really good handle on the extent of contamination. The points that I agreed upon would only further refine our understanding of the extent of contamination. Below is a summary of the proposed delineation points that I agreed with, disagreed with, and really couldn't make up my mind(☺). The reason for the last category is often their justification was a sampling point that was just above the criteria (for example, total PCBs 0.26 ppm). Also, they suggest collecting vertical samples. I agree there is value in this, but the water table is very shallow and we are collecting groundwater samples. Perhaps this is something we could do during the design phase.

Summary:

Agree: #5, 8, 11, 12, 14, 17, 24*, 28, 29

Disagree: #1, 3, 4, 6, 9, 10, 13, 15, 16, 18, 19, 21, 22, 25, 26, 30, 31, 32, 33, 34, 35

Could go either way: #2, 7, 17, 20, 23

*only sample if this feature of interest is present.

Katie

Katherine Ryan Mishkin
Geologist
Superfund Technical Support Section
U.S. EPA Region 2
290 Broadway, 18th Floor
New York, NY 10007
(p) 212-637-4449
(f) 212-637-4439

From: Sivak, Michael

Sent: Tuesday, July 21, 2015 5:29 PM

To: Mitchell, Tanya; Clemetson, Michael; Mishkin, Katherine

Subject: RE: Rolling Knolls Requested Map and Location Information

Tanya,

I looked over NJDEP's proposed sample locations and have some thoughts:

1. NJDEP is asking for additional sampling all along the perimeter of the landfill at approximately 200 foot intervals, which accounts for approximately 28 additional samples. It doesn't appear that these requests take into account the perimeter sampling that already has been conducted. For example, proposed location 9 is near SS-106. Are the results from SS-106 available? If so, these data should be reviewed to see if there are exceedance of state soil remediation standards, to see if further delineation is necessary.
2. Many proposed locations are justified as a depositional area, lower than samples that have already been collected. Is the steepness from the existing sample locations to the proposed sample locations significant enough to be concerned with these areas being depositional? For example, proposed location 16 is near SS-109 and SS-110, show not much contamination (PCBs at 1.28 mg/kg at SS-110, PCBs are ND at SS-109). Is the elevation at proposed location 16 significantly lower than at SS-109 and SS-110 to justify the additional sample?
3. The samples proposed for the interior of the landfill appear to be bounded by existing sample locations. I'm unclear what the purpose of this sampling is. Based on the data that exist, results would be extrapolated from one point to another. Would the proposed samples provide a refinement of these extrapolations? Or is there some other line of evidence to suggest that these areas require further delineation?

What do the rest of you think?

Michael Sivak
212.637.4310

From: Mitchell, Tanya

Sent: Monday, July 20, 2015 10:50 AM

To: Sivak, Michael; Clemetson, Michael; Mishkin, Katherine

Subject: FW: Rolling Knolls Requested Map and Location Information

Hello All,

Attached are the figures and associated rationale for the sampling locations identified on the figures submitted by NJDEP. Jill (NJDEP) offered her apology due for the delay. Unfortunately, she was

pulled away on a separate case.
Thanks,
Tanya